



Sterling Environmental Engineering, P.C.

October 13, 2004

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Subject: South Troy Brownfields Pilot Project Sampling, Analysis and Monitoring Plan
STERLING File #22026 – Task #2.3

Dear Mr. Hom,

Ms. Andrea Poley of the City of Troy and I held a conference call on Friday, October 1, 2004 with Mr. Larry D'Andrea of your office regarding the South Troy Brownfields Pilot Project Sampling, Analysis and Monitoring Plan (SAMP). The USEPA commented in an August 10, 2004 e-mail to Ms. Andrea Poley of the City of Troy on the SAMP that the City had submitted in March 2004. I sent an e-mail message to you on September 13, 2004 which proposed certain revisions to the SAMP in response to the August 10, 2004 comments. You shared my September 13, 2004 e-mail with Mr. D'Andrea.

During the conference call, the proposed revisions were reviewed. Mr. D'Andrea found these revisions to be acceptable and requested that these revisions be memorialized in writing. This letter provides a summary of the revisions. The SAMP will be subsequently revised in conformance with this letter. Mr. D'Andrea stated that the approval to proceed with the sampling could be based upon the memorialization in writing, i.e. this letter.

At this point, the City of Troy is very desirous of gaining the USEPA approval for the SAMP so that the proposed sampling may proceed as quickly as possible. As we discussed, the City is helping to develop the Rensselaer Iron Works (former Scolite Property) into the Upper Satellite Facility of the Hudson Rivers and Estuaries Center funded largely by New York State. This is an extremely critical project for the City and New York State. Consequently, obtaining soil and groundwater data in an expeditious manner is necessary in order to ensure that the planning and design for this facility remain on schedule.

The site assessment for soil engineering properties, building conditions, and other aspects not directly involving potential releases of hazardous waste is scheduled to start in November 2004 prior to the onset of winter conditions. Therefore, the review and approval of the SAMP needs to be expedited.

Also since March 2004, the New York State Department of Environmental Conservation (NYSDEC) has awarded New York State grant funds to the Rensselaer County Industrial Development Agency (RCIDA) for the purpose of conducting a Brownfields Investigation on the RCIDA's vacant property in the central portion of the South Troy Brownfields Pilot Study Area. The RCIDA is on the verge of receiving, or already has received, approval from the NYSDEC to begin sampling. This means that there is no longer the need under the South Troy Brownfields Pilot Project to sample the RCIDA Area Of Concern that is described in the SAMP that was previously submitted to the USEPA.

Therefore, the City proposes the following modifications to the SAMP:

Proposed Modifications:

Rensselaer Iron Works (former Scolite Property)

To satisfy the USEPA concern that the groundwater could be introducing contaminants to the Hudson River, the City proposes the following:

1. Two (2) borings already proposed will be converted to wells as part of the subsurface investigation effort. These borings are labeled S-B1 and S-B4 on Figure 1B of the SAMP. The area that was to be explored by a trench will be replaced with three (3) borings and the southernmost boring location will be converted to a well.
2. The wells will be 2 inch inside diameter PVC with slotted PVC screens that extend approximately five (5) feet into the groundwater.
3. The wells will be finished with a curb box to allow future sampling, if such proves to be necessary.
4. The groundwater samples will be sent for analysis to the analytical laboratory for Semi-Volatile Organic Compounds (SVOCs) and Priority Pollutant metals. These parameters are appropriate for the previous operations that have occurred at the Area Of Concern, including the operation of a foundry that may have machined brass and the scrap metal transfer facility.

King Fuels North (The Alamo)

This is a small Area of Concern (1.5 acres) and is primarily suspected of a potential petroleum release (a very large fuel oil storage tank was located in approximately the center of the site from approximately 1952 to 1982). Although slag and coal tar could conceivably been deposited at this Area Of Concern, the Sanborn maps and other records appear to imply that the land was at its present grade prior to 1904. The Area Of Concern is relatively distant from the Hudson River. These conditions vastly reduce the likelihood that significant amounts of slag and coal tar were deposited at this location. One well appears sufficient to characterize the groundwater at such a small Area Of Concern. Testing for SVOCs is appropriate to the potential for a fuel oil release and slight potential of a coal tar deposition. Also, testing for priority pollutant metals is appropriate to the slight potential of a slag deposition.

The City proposes:

1. The areas that were to be explored by trenches will be replaced with borings and the boring location that is southwest of, and adjacent to, the tank pad will be converted to a well. This is sufficient for the confined area of this small site where a potential petroleum release could have contaminated groundwater. Evidence at a nearby site indicates that groundwater probably flows west or southwest.
2. The well will be 2 inch inside diameter PVC with a slotted PVC screen that will extend approximately 5 feet into the groundwater.

3. The well will be finished with a curb box to allow future sampling, if such proves to be necessary.
4. The groundwater samples will be sent for analysis to the analytical laboratory for SVOCs and Priority Pollutant metals.

County IDA Property

1. All references to this property will be removed.

Conclusions:

The above described changes will be made to the SAMP and a copy will be submitted to the USEPA as soon as possible.

Please call me should you have any questions.

Very truly yours,

STERLING ENVIRONMENTAL ENGINEERING, P.C.



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